

JOHN W. HUBER, United States Attorney (#7226)  
VERNON G. STEJSKAL, Assistant United States Attorney (#8434)  
MICHAEL GADD, Special Assistant United States Attorney (#13704)  
Attorneys for the United States of America  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111-2176  
Telephone: (801) 524-5682

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

---

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

AARON MICHAEL SHAMO,  
DREW WILSON CRANDALL,  
ALEXANDRYA TONGE,  
KATHERINE BUSTIN,  
MARIO NOBLE, and  
SEAN GYGI,

Defendants.

Case No. 2:16 CR 631 DAK

SUPPLEMENTAL  
NOTIFICATION OF COMPLIANCE  
AND REQUEST FOR  
RECIPROCAL DISCOVERY

Judge Dale A. Kimball

---

The United States of America, by and through the undersigned, hereby files its supplemental notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendants.

The United States gives notice that the following is being or has been provided to counsel for the defendants:

Description	Bates Number
Discovery produced: NOC 02	001-009-011-00001 (Audio) 002-001-001-00280 - 002-001-001-00388 002-002-001-00001 - 002-002-001-00018 002-002-002-00001 - 002-002-002-00137 002-002-003-00001 - 002-002-003-00237 002-002-004-00001 - 002-002-004-00028 002-002-005-00001 - 002-002-005-00004 002-003-001-00001 - 002-003-001-00181 002-004-001-00001 - 002-004-001-00006 002-004-002-00001 002-005-001-00001 002-005-002-00001 002-005-003-00001 002-006-001-00001 002-007-001-00001 (audio) 002-007-002-00001 (audio) 002-007-003-00001 (audio) 002-007-004-00001 (audio) 002-007-005-00001 (audio) 002-007-006-00001 (audio) 002-007-007-00001 (video) 002-008-001-00001 - 002-008-001-00012 002-008-002-00001 (video) 002-008-003-00001 (video) 002-008-004-00001 - 002-008-004-00006 002-008-005-00001 002-008-006-00001 - 002-008-006-00232 002-008-007-00001 (video) 002-008-008-00001 (native) 002-008-009-00001 (native) 002-008-010-00001 - 002-008-010-00020 002-008-011-00001 - 002-008-011-00002 002-008-012-00001 002-008-013-00001 - 002-008-013-00022 002-008-014-00001 002-008-015-00001 002-008-016-00001 (audio) 002-008-017-00001 (audio) 002-008-018-00001 002-008-020-00001 - 002-008-020-00088 002-008-021-00001 002-008-022-00001 002-008-023-00001 (audio) 002-008-024-00001 (audio) 002-008-025-00001 (audio) 002-008-026-00001 - 002-008-026-00002

	002-008-027-00001 - 002-008-027-00002
	002-008-028-00001
	002-008-029-00001
	002-008-030-00001
	002-008-031-00001
	002-008-032-00001 - 002-008-032-00002
	002-008-033-00001 - 002-008-033-00002
	002-008-034-00001 - 002-008-034-00002
	002-008-035-00001
	002-008-036-00001
	002-008-037-00001
	002-008-038-00001 - 002-008-038-00002
	002-008-039-00001
	002-008-040-00001 - 002-008-040-00002
	002-008-041-00001 - 002-008-041-00005
	002-008-042-00001 - 002-008-042-00003
	002-008-043-00001 (audio)
	002-008-044-00001 (audio)
	002-008-045-00001 (audio)
	002-008-046-00001 (audio)
	002-008-047-00001 (audio)
	002-008-048-00001 - 002-008-048-00003
	002-008-049-00001
	002-008-050-00001
	002-008-051-00001 - 002-008-051-00030
	002-008-052-00001
	002-008-053-00001
	002-008-054-00001
	002-008-055-00001
	002-008-056-00001 - 002-008-056-00003
	002-008-057-00001 - 002-008-057-00009
	002-008-058-00001
	002-008-059-00001
	002-008-060-00001
	002-008-061-00001
	002-008-062-00001
	002-008-063-00001
	002-008-064-00001
	002-008-065-00001
	002-008-066-00001
	002-008-067-00001
	002-008-068-00001
	002-008-069-00001
	002-008-070-00001
	002-008-071-00001 (audio)
	002-008-072-00001 - 002-008-072-00005
	002-008-073-00001 - 002-008-073-00001
	002-008-074-00001 (audio)

002-008-075-00001  
 002-008-076-00001  
 002-008-077-00001  
 002-008-078-00001 - 002-008-078-00012  
 002-008-079-00001 - 002-008-079-00004  
 002-008-080-00001 (native)  
 002-008-081-00001 - 002-008-081-00005  
 002-008-082-00001  
 002-008-083-00001 (audio)  
 002-008-084-00001 (audio)  
 002-008-085-00001 (audio)  
 002-008-086-00001 (audio)  
 002-008-087-00001 (audio)  
 002-008-088-00001 (audio)  
 002-008-089-00001 - 002-008-089-00181  
 002-008-090-00001 - 002-008-090-00018  
 002-008-091-00001 - 002-008-091-00137  
 002-008-092-00001 - 002-008-092-00237  
 002-008-093-00001 - 002-008-093-00028  
 002-008-094-00001 - 002-008-094-00004  
 002-008-095-00001 - 002-008-095-00006  
 002-008-096-00001  
 002-008-097-00001  
 002-008-098-00001 (audio)  
 002-008-099-00001 - 002-008-099-00002  
 002-008-100-00001  
 002-008-101-00001 (audio)  
 002-008-102-00001 (audio)  
 002-008-103-00001  
 002-008-104-00001 - 002-008-104-00016  
 002-008-105-00001  
 002-008-106-00001 (audio)  
 002-008-107-00001 - 002-008-107-00002  
 002-008-108-00001 (audio)  
 002-008-109-00001 - 002-008-109-00002  
 002-008-110-00001 - 002-008-110-00007  
 002-008-111-00001 - 002-008-111-00007  
 002-008-112-00001 - 002-008-112-00037  
 002-008-113-00001 (audio)  
 002-008-114-00001 - 002-008-114-00002  
 002-008-115-00001 (audio)  
 002-008-116-00001 - 002-008-116-00086  
 002-008-117-00001 - 002-008-117-00004  
 002-008-118-00001 - 002-008-118-00004  
 002-008-119-00001 - 002-008-119-00003  
 002-008-120-00001  
 002-008-121-00001 - 002-008-121-00003  
 002-008-122-00001 (audio)

002-008-123-00001 (audio)  
 002-008-124-00001 (audio)  
 002-008-125-00001 - 002-008-125-00005  
 002-008-126-00001 - 002-008-126-00002  
 002-008-127-00001 - 002-008-127-00002  
 002-008-128-00001  
 002-008-129-00001  
 002-008-130-00001  
 002-008-131-00001  
 002-008-132-00001  
 002-008-133-00001  
 002-008-134-00001 (audio)  
 002-008-135-00001  
 002-008-136-00001 - 002-008-136-00003  
 002-008-137-00001  
 002-008-138-00001 - 002-008-138-00002  
 002-009-001-00001 - 002-009-001-00038  
 002-010-001-00001 - 002-010-001-00025  
 002-011-001-00001 - 002-011-001-01819  
 002-011-002-00001 - 002-011-002-01158  
 002-011-003-00001 - 002-011-003-00881  
 002-011-004-00001 - 002-011-004-00100  
 002-011-005-00001 - 002-011-005-00100  
 002-011-006-00001 - 002-011-006-00100  
 002-011-007-00001 - 002-011-007-00067  
 002-011-008-00001 - 002-011-008-00009  
 002-011-009-00001  
 002-011-010-00001  
 002-011-011-00001  
 002-011-012-00001  
 002-011-013-00001  
 002-011-014-00001  
 002-011-015-00001  
 002-011-016-00001  
 002-011-017-00001  
 002-011-018-00001 - 002-011-018-01984  
 002-011-019-00001 (native)  
 002-011-020-00001 (native)  
 002-011-021-00001 - 002-011-021-00103  
 002-011-022-00001 (video)  
 002-011-023-00001 (video)  
 002-012-001-00001 - 002-012-001-00040  
 002-013-001-00001 - 002-013-001-00016  
 002-013-002-00001 - 002-013-002-00058  
 002-013-003-00001 - 002-013-003-00055  
 002-013-004-00001 - 002-013-004-00005  
 002-013-005-00001 - 002-013-005-00050  
 002-014-001-00001 - 002-014-001-00007

002-014-002-00001 - 002-014-002-00028  
 002-014-003-00001 - 002-014-003-00075  
 002-014-004-00001 - 002-014-004-00009  
 002-014-005-00001 - 002-014-005-00014  
 002-014-006-00001 - 002-014-006-00001  
 002-014-007-00001 - 002-014-007-00003  
 002-014-008-00001 - 002-014-008-00193  
 002-014-009-00001 - 002-014-009-00450  
 002-014-010-00001 - 002-014-010-00513  
 002-014-011-00001 - 002-014-011-00002  
 002-014-012-00001 - 002-014-012-00023  
 002-014-013-00001 - 002-014-013-00006  
 002-014-014-00001 - 002-014-014-00015  
 002-014-015-00001 - 002-014-015-00003  
 002-014-016-00001 - 002-014-016-00273  
 002-014-017-00001 - 002-014-017-00015  
 002-014-018-00001 - 002-014-018-00002  
 002-014-019-00001 - 002-014-019-00025  
 002-014-020-00001 - 002-014-020-00024  
 002-014-021-00001 - 002-014-021-00009  
 002-014-022-00001 - 002-014-022-00010  
 002-014-023-00001 (native)  
 002-014-024-00001 - 002-014-024-00142  
 002-014-025-00001 - 002-014-025-00024  
 002-014-026-00001 - 002-014-026-00004  
 002-014-027-00001 - 002-014-027-00004  
 002-014-028-00001 - 002-014-028-00008  
 002-014-029-00001 - 002-014-029-00017  
 002-014-030-00001 - 002-014-030-00006  
 002-014-031-00001 - 002-014-031-00016  
 003-008-003-00001 - 003-008-003-00002  
 003-008-004-00001 - 003-008-004-00198  
 004-001-002-00006 - 004-001-002-00011  
 004-006-001-00001 - 004-006-001-00003  
 004-006-002-00001 - 004-006-002-00008  
 004-006-003-00001 - 004-006-003-00005  
 004-006-004-00001 - 004-006-004-00450  
 004-006-005-00001 - 004-006-005-00511  
 004-006-006-00001 - 004-006-006-00005  
 004-006-007-00001 - 004-006-007-00002  
 004-006-008-00001  
 004-006-009-00001  
 005-009-001-00001 (native)  
 005-009-002-00001 (native)  
 005-009-003-00001 (native)  
 005-009-004-00001 (native)  
 005-009-005-00001 (native)  
 005-009-006-00001 (native)

	<b>005-009-007-00001 (native)</b> <b>005-009-008-00001 (native)</b> <b>005-009-009-00001 (native)</b> <b>005-009-010-00001 - 005-009-010-00001</b> <b>005-009-011-00001 - 005-009-011-00001</b>
--	---

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and

- c. A written summary of the testimony of any expert the defendant intends to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 13th day of September, 2017.

JOHN W.HUBER  
United States Attorney

/s/ Michael Gadd  
MICHAEL GADD  
Special Assistant United States Attorney



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing SUPPLEMENTAL NOTIFICATION OF COMPLIANCE was made available to all parties named below, this 13th day of September, 2017.

Gregory G. Skordas Attorney for Def. Shamo (1) 560 South 300 East Suite 225 Salt Lake City, Utah 84111 <a href="mailto:gskordas@schhlaw.com">gskordas@schhlaw.com</a>	James C. Bradshaw Mark Moffat Attorneys for Def. Crandall (2) 422 North 300 West Salt Lake City, Utah 84103 <a href="mailto:jim@brownbradshaw.com">jim@brownbradshaw.com</a> <a href="mailto:mark@brownbradshaw.com">mark@brownbradshaw.com</a>
Ed Brass Attorney for Def. Tonge (3) 175 East 400 South, #400 Salt Lake City, Utah 84111 <a href="mailto:ed@edbrasslaw.com">ed@edbrasslaw.com</a>	Earl Xaiz Attorney for Def. Bustin (4) 175 East 400 South, #400 Salt Lake City, Utah 84111 <a href="mailto:earlxaiz@gmail.com">earlxaiz@gmail.com</a>
Kyler E. Ovard Attorney for Def. Noble (5) 1041 W SoHo Midvale, Utah 84047 <a href="mailto:kovard@sb-legal.net">kovard@sb-legal.net</a>	Brett L. Tolman Eric Benson Attorneys for Def. Gygi (6) 36 S State Street, Suite 1400 PO Box 45385 Salt Lake City, Utah 84145-0385 <a href="mailto:btolman@rqn.com">btolman@rqn.com</a> <a href="mailto:ebenson@rqn.com">ebenson@rqn.com</a>

/s/ Yvette Laughter  
Litigation Support Specialist